

**From:** [Westfall, Constance](#)  
**To:** [Salinas, Amy](#)  
**Subject:** Re: Delta Shipyard - Confidential Settlement Communication  
**Date:** Thursday, September 7, 2017 5:13:53 PM

---

Amy-

10 days is fine.

Thanks!

Connie

On Sep 6, 2017, at 2:29 PM, Salinas, Amy <[salinas.amy@epa.gov](mailto:salinas.amy@epa.gov)> wrote:

I am preparing a response in writing to send to you soon. We are asking for a 10 day turnaround from receipt of the letter since I have already explained our position verbally on August 29, 2017. I look forward to your reply to the letter. It is EPA's hope to negotiate an AOC for the RI/FS with Chromalloy.

Thanks,  
Amy

---

**From:** Westfall, Constance [<mailto:Connie.Westfall@strasburger.com>]

**Sent:** Friday, September 01, 2017 12:09 AM

**To:** Salinas, Amy <[salinas.amy@epa.gov](mailto:salinas.amy@epa.gov)>

**Cc:** Mahley, Bill <[Bill.Mahley@strasburger.com](mailto:Bill.Mahley@strasburger.com)>

**Subject:** Delta Shipyard - Confidential Settlement Communication

Amy:

Thanks for your time discussing EPA's position on its CERCLA jurisdiction over oil-field drilling material. To explain this to our client, it would be very helpful if you could provide this analysis to us in writing. For your convenience, attached is our legal memorandum which reached a different conclusion.

Also, you stated that EPA would like a response from our client by September 15<sup>th</sup>. I'd like to modify this slightly to two weeks from when we receive EPA's written analysis.

Thanks again and hope you have a great Labor Day weekend,  
Connie

Constance Courtney Westfall • Partner • Strasburger & Price, LLP

720 Brazos Street, Suite 700, Austin, TX 78701

512.499.3616 • Fax 512.539.5724 • [Strasburger.com](http://Strasburger.com)

---

*This email message and any attachments are confidential and may be privileged. If you are not the intended recipient, please notify Strasburger & Price, LLP immediately -- by replying to this message or by sending an email to [postmaster@strasburger.com](mailto:postmaster@strasburger.com) -- and destroy all copies of this message and any*

*attachments. Thank you.*

---